1 2 3	LYN R. AGRE (SBN 178218) MARGARET A. ZIEMIANEK (SBN 233418) GUNNAR K. MARTZ (SBN 300852) KASOWITZ, BENSON, TORRES & FRIEDMAN LLF 101 California Street, Suite 2300			
4	San Francisco, California 94111 Telephone: (415) 655-4308			
5	Facsimile: (415) 398-5030 lagre@kasowitz.com mziemianek@kasowitz.com			
6	gmartz@kasowitz.com			
7	Attorneys for Defendants THE RELATED COMPANIES INC			
8	THE RÉLATED COMPANIES, INC., THIRD AND MISSION ASSOCIATES, LLC, and RELATED MANAGEMENT COMPANY, L.P.			
9				
10	UNITED STATES DISTRICT CO NORTHERN DISTRICT OF CALIF			
11	PETER HOLLAND and KRISTEN	Case No. 4:15		
12	HOLLAND,	Hon. Judge Jef		
13	Plaintiffs,	STIPULATION		
14	V.	ORDER CONTI		
15 16	THE RELATED COMPANIES, INC.; THIRD AND MISSION ASSOCIATES, LLC; RELATED	(DKT. NO. 51)		
17	MANAGEMENT CÓMPANY, L.P.; DOES 1 through 10, inclusive			
18	Defendants.			
19				
20				
21				
22				
23				
24				
25				
26				
27				
28				

LLC,
PANY, L.P.

S DISTRICT COURT
LICT OF CALIFORNIA

Case No. 4:15-CV-03220 JSW

Hon. Judge Jeffery S. White

STIPULATION AND [PROPOSED]

ORDER CONTINUING DEADLINES SET
IN JANUARY 15, 2016 ORDER
(DKT. NO. 51)

Case 4:15-cv-03220-JSW Document 65 Filed 04/29/16 Page 2 of 5

1	By and through their attorneys of record, Defendants THE RELATED COMPANIES,			
2	2 INC., THIRD AND MISSION ASSOCIATES, LLC,	INC., THIRD AND MISSION ASSOCIATES, LLC, and RELATED MANAGEMENT		
3	3 COMPANY, L.P. (collectively, "Defendants") and Pl	COMPANY, L.P. (collectively, "Defendants") and Plaintiffs PETER HOLLAND and KRISTIN		
4	4 HOLLAND ("Plaintiffs") hereby stipulate and agree a	HOLLAND ("Plaintiffs") hereby stipulate and agree as follows:		
5	5 WHEREAS, the Court entered an order on Jar	WHEREAS, the Court entered an order on January 15, 2016, (Dkt. No. 51) setting case		
6	deadlines pursuant to stipulation of the parties;			
7	WHEREAS, Defendants' counsel and Plaintiffs' counsel have met and conferred, and			
8	agree that extension of certain of the deadlines in the current scheduling order is warranted.			
9	IT IS HEREBY STIPULATED AND AGREED, by and between the parties hereto and			
10	their respective undersigned attorneys, as follows:			
11	The parties respectfully jointly request that the Court continue the deadlines set forth in the			
12	January 15, 2016 Order as follows:	January 15, 2016 Order as follows:		
13	Discovery Cut-off N	May 23, 2016		
14	Designation of experts N	May 23, 2016		
15	Expert discovery cut-off J	une 20, 2016		
16	16			
17	The parties propose no change to the following deadlines set forth in the January 15, 2015			
18	Order:			
19	Hearing of dispositive motions J	uly 8, 2016		
20	20 Pretrial conference S	September 26, 2016 at 2:00 p.m.		
21	21 Jury selection C	October 26, 2016 at 8:00 a.m.		
22	22 Trial	October 31, 2016 at 8:00 a.m.		
23	23 IT IS SO STIPULATED.			
24	24			
25	25			
26	26			
27	27			
28	28			

Case 4:15-cv-03220-JSW Document 65 Filed 04/29/16 Page 3 of 5

1		Respectfully submitted,
2		_r
3		
4	DATED: April 28, 2016	/s/ Lyn R. Agre Lyn R. Agre
5		KASOWITZ, BENSON, TORRES & FRIEDMAN LLP
6		& FRIEDMAN LLP
7		Attorneys for Defendants THE DELATED COMPANIES INC.
8		THE RELATED COMPANIES, INC., THIRD AND MISSION ASSOCIATES,
9		LLC, and RELATED MANAGEMENT
10		COMPANY, L.P.
11	DATED: April 28, 2016	_/s/ Celia McGuinness
12	,	Paul L. Rein Celia McGuinness
13		Catherine Cabalo
14		LAW OFFICES OF PAUL L. REIN
		Steven L. Derby
15		THE DERBY LAW FIRM P.C.
16		Attorneys for Plaintiffs PETER HOLLAND and
17		KRISTEN HOLLAND
18		
19		
20		
21		
22		
23		
24		
25		
26		
27		
28		
		3

CERTIFICATION OF COMPLIANCE WITH L.R. 5-1(i)(3) Pursuant to Local Rule 5-1(i)(3), I hereby certify that the content of this document is acceptable to Celia McGuinness and Steven L. Derby, counsel for Plaintiffs, and that I have obtained their authorization to affix their respective electronic signatures to this document. DATED: April 28, 2016 /s/Lyn R. Agre_ Lyn R. Agre KASOWITZ, BENSON, TORRES & FRIEDMAN LLP Attorneys for Defendants THE RELATED COMPANIES, INC. THIRD AND MISSION ASSOCIATES, LLC, and RELATED MANAGEMENT COMPANY, L.P.

1	[PROPOSED] ORDER			
2	Pursuant to the parties' stipulation, it is hereby ordered that the deadlines set forth in the			
3	January 15, 2016 Order are vacated and rese	January 15, 2016 Order are vacated and reset as follows:		
4	Discovery Cut-off	May 23, 2016		
5	Designation of experts	May 23, 2016		
6	Expert discovery cut-off	June 20, 2016		
7	Hearing of dispositive motions	July 8, 2016		
8	Pretrial conference	September 26, 2016 at 2:00 p.m.		
9	Jury selection	October 26, 2016 at 8:00 a.m.		
10	Trial	October 31, 2016 at 8:00 a.m.		
11	IT IS SO ORDERED.			
12				
13	DATED: April 29, 2016	White		
14		Honorable leffer S. White		
15				
16				
17				
18				
19				
20				
21				
22				
23				
24				
25				
26				
27				
28				